

EXHIBIT A

(Amended Proposed Order)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

ALTO MAIPO DELAWARE LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 21-11507 (KBO)

(Jointly Administered)

ORDER DIRECTING THE PRODUCTION OF DOCUMENTS

Upon the motion (the “Motion”)² of the Official Committee of Unsecured Creditors (the “Committee”) of Alto Maipo SpA (“Alto Maipo”) and Alto Maipo Delaware LLC (“Alto Maipo Delaware”), debtors and debtors in possession (together, the “Debtors”), for entry of an order pursuant to Bankruptcy Code section 105(a), Bankruptcy Rule 2004, and Local Rule 2004-1, directing the Debtors to produce a copy of the PPA as well as any other related documents and this Court having jurisdiction to decide the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012; and upon consideration of the Motion; and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and finding that adequate notice of the Motion having been given; and it appearing that no other or further notice need be given; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number in the jurisdiction in which it operates, are: Alto Maipo SpA (761-2) (Chile) and Alto Maipo Delaware LLC (1916) (Delaware). The location of the corporate headquarters and the service address for Alto Maipo SpA is Los Conquistadores 1730, Piso 10, Santiago, Chile.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

1. The Motion is granted to the extent set forth herein.
2. The Debtors are directed to produce to the Committee (a) a copy of the PPA, (b) the Debtors' current (and future) business plan that incorporates or otherwise relates to the PPA, and (c) any other documents or agreements related to the PPA or reflecting its terms that the Debtors would otherwise be precluded from producing in connection with the confidentiality restrictions articulated in Section 17 of the PPA.
3. Access to documents produced pursuant to paragraph 2 above shall be subject to the confidentiality provisions of the bylaws adopted by the Committee. Any filings of pleadings containing any materials produced by the Debtors pursuant to paragraph 2 above of this Order shall be made only under seal.
4. The Committee's rights are reserved to request additional discovery and/or examination, including, without limitation, requests based on any information that may be revealed as a result of the discovery authorized pursuant to this Order.
5. This Order is without prejudice to the right of the Committee to seek further discovery of any other entity.
6. The terms and conditions of this Order shall be effective immediately and enforceable upon its entry.
7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.